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MCIWORLD.COM ORIGINAL

1801 Pennsylvania Avenue, NW
Washington, DC 20006

EX PARTE OR LATE FILED

October 22, 1999

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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OCT 22 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket No. 99-295

Dear Ms. Salas:

The attached document, an affidavit filed by Bell Atlantic at the New York Public Service Commission on October 8, 1999, was e-mailed by me to Carol Matthey and Andrea Kearney of the Common Carrier Bureau's Policy and Program Planning Division, on October 15, 1999. We briefly discussed this affidavit, specifically with respect to Bell Atlantic's commitments to achieve higher flow-through rates, at a meeting with members of the Common Carrier Bureau on October 14, 1999.

In accordance with section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b), an original and one copy of this memorandum and attachment are being filed with your office.

Sincerely,



Lori Wright
Senior Manager, Regulatory Affairs

cc: Andrea Kearney

No. of Copies rec'd 051
List ABCDE



Bell Atlantic
1095 Avenue of the Americas
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New York, New York 10036

212-395-6405 (phone)
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Randal S. Milch
Associate General Counsel
State Regulatory North

October 8, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY E-MAIL AND HAND

Lawrence G. Malone, Esq.
General Counsel
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

Re: Case 97-C-0271

Dear Mr. Malone:

New York Telephone Company, d/b/a Bell Atlantic - New York ("BA-NY"), hereby submits an original and twenty-five (25) copies of the Joint October Reply Affidavit of Stuart Miller, Sean J. Sullivan and Arthur Zanfini on Behalf of Bell Atlantic - New York. Information proprietary to MCI has been redacted from this public version of the Affidavit. An unredacted proprietary version of this Affidavit has been filed with Administrative Law Judge Brillling in accordance with the procedures established for this proceeding.

This Affidavit has been provided to the parties to this proceeding via E-Mail today. A hard copy will be served by overnight delivery along with a copy of this letter.

Respectfully submitted,

Randal S. Milch

Enclosure

cc: Service List (By E-Mail & Overnight Delivery)
Honorable Debra Renner, Acting Secretary (By Hand)
Hon. Jaclyn A. Brillling (By E-Mail & Hand)
Hon. Eleanor Stein (By E-Mail & Hand)
Peter M. McGowan, Esq. (By E-Mail & Hand)
Andrew M. Klein, Esq. (By E-Mail & Hand)

*** REDACTED VERSION ***

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OCT 22 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

-----X
Petition of New York Telephone Company for Approval :
of its Statement of Generally Available Terms and :
Conditions Pursuant to Section 252 of the :
Telecommunications Act of 1996; and Draft Filing of :
Petition for InterLATA Entry Pursuant to Section 271 of :
the Telecommunications Act of 1996 to Provide In- :
Region, InterLATA Services in the State of New York :
-----X

Case 97-C-0271

JOINT OCTOBER REPLY AFFIDAVIT OF STUART MILLER,
SEAN J. SULLIVAN AND ARTHUR ZANFINI
ON BEHALF OF BELL ATLANTIC - NEW YORK

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Stuart Miller, Sean J. Sullivan and Arthur Zanfini, being duly sworn upon oath, depose
and state as follows:

1. My name is Stuart Miller. My business address is 1095 Avenue of the Americas,
26th Floor, New York, New York 10036. I previously filed a number of affidavits in this
proceeding. I also provided testimony in the Technical Conferences held June 7-9, 1999 and
July 27-30, 1999. My background is set forth in an affidavit I filed on February 18, 1997, in an
earlier stage of this proceeding.

2. My name is Sean J. Sullivan. My business address is 125 High Street, Boston,
Massachusetts 02110. My current position is Director, TIS Systems and Infrastructure. I have
filed two earlier affidavits in this proceeding. My background and responsibilities are described

in the Second July Update Affidavit, filed July 22, 1999. I also provided testimony in the Technical Conferences held June 7-9, 1999 and July 27-30, 1999.

3. My name is Arthur Zanfini. My business address is 140 West Street, 7th Floor, New York, New York 10019. My current position is Director – Telecom Industry Services Operations Center (“TISOC”) for Bell Atlantic-North. I previously filed the Joint September Reply Affidavit (“Joint Sept Reply”) and my background and responsibilities are set forth therein.

4. The purpose of this Joint October Reply Affidavit is to respond to claims made in the Supplemental Reply Affidavit filed on October 1, 1999, by Mr. John Sivori on behalf of MCI WorldCom (“MCI”) that addresses the Joint September Reply Affidavit filed by BA-NY on September 27, 1999. Significantly, while MCI’s affidavit is long on argument concerning the level of order flow through, it makes no case whatsoever that BA-NY’s alleged “failure” to achieve a higher flow through rate for MCI’s UNE-Platform orders has created a competitive disadvantage for MCI in the local market. In fact, the evidence plainly shows that MCI has not been subjected to any competitive damage because of the level of flow through. (Joint Sept Reply ¶ 9.) Thus, there is simply no factual basis for MCI’s conclusory argument that BA-NY’s systems cannot flow through orders “at acceptable rates.” (MCI ¶ 7.) On the contrary, the uncontroverted evidence shows that, if MCI truly desired to increase its achieved level of flow through order processing, it could do so by improving the work effort quality of its own personnel. Yet MCI indicates no inclination to act. (MCI ¶ 8.)

5. There is an Exhibit associated with this Affidavit, containing one document labeled as Attachment 1.

6. The MCI reply affidavit quickly passes over the fact that its own order flow through has risen over the past four months from **

*** in August. (MCI ¶ 5.) Similarly, the MCI reply affidavit ignores entirely that the original bases for its discontent – the “failure” of BA-NY processes to deliver firm order commitments (“FOCs”) and reject notices timely – has similarly been negated by responsive BA-NY efforts. (Joint Sept Reply ¶ 10.) Significant progress has already been made in precisely those areas where MCI claimed it was necessary.

7. MCI’s reply affidavit does not contest the validity of the studies BA-NY has presented. Thus, both parties agree that BA-NY system error is only a small factor in the failure of orders to flow through to provisioning without manual processing. (See chart at MCI Reply ¶ 4.)¹ MCI does not contend that CLEC ordering errors are not a substantial cause of unnecessary manual processing. On the contrary, every study conducted indicates that the level of CLEC error is four to five times larger than the level of BA-NY system error. (*Id.*) There is simply no question that overall flow through levels could be raised significantly by the reduction in CLEC ordering errors.

8. Steps already underway should continually diminish CLEC error as a source of order fallout. First, as more CLECs take advantage of the availability of integrateable pre-order and ordering systems, CLEC errors will go down. As KPMG reported, CLECs have the ability to create that integrated system, and at least one CLEC has done so. Moreover, MCI stated at the Oral Argument held five weeks ago that it was on the verge itself of integrating the two “most important” pre-ordering records via EDI. (Joint Sept Reply ¶ 14.)

¹ For example, the uncontested evidence shows that in August BA-NY system errors accounted for only **
*** of all MCI orders routed to manual processing. By contrast, MCI’s own errors caused **
orders to be routed for manual processing **

9. Further, in order to help CLECs reduce their level of order errors, BA-NY will initiate monthly workshops to address specifically the improvement of Local Service Request (“LSR”) order quality. BA-NY will provide generic examples of LSRs that failed to meet flow through criteria and suggested steps for improvement. This will serve to improve CLEC order quality, reduce LSR rejects, and improve the overall flow through rate. Bell Atlantic will also continue to work individually with CLECs to address their specific and unique order quality concerns. Continued efforts at reducing CLEC errors have the potential of raising the overall flow through rate by as much as 15%.

10. On the facts, the only thing that truly distinguishes the parties’ respective positions is that MCI attempts to blame BA-NY for the orders that are not designed to flow through, but rather are routed intentionally to TISOC representatives for special handling. Here MCI contends that BA-NY has not met its commitments for order flow through capability set forth in the Pre-filing Statement (“PFS”), dated April 6, 1998. (MCI ¶ 10.) This contention is simply incorrect, as discussed in detail in the attached letter of BA-NY counsel to Administrative Law Judge Jaclyn A. Brillling, dated October 8, 1999. (Exhibit, Attachment 1.) BA-NY has met its PFS commitment to enable CLEC orders to flow through to provisioning.

11. Once its PFS claim is removed, MCI basically argues that – as a matter of system design – BA-NY *should not* route the orders at issue to TISOC for manual handling. (MCI ¶ 7.) BA-NY is willing to act on a number of the proposals for additional flow through made by MCI and the other CLECs. The several studies of existing platform traffic that have been shared at recent Carrier-to-Carrier meetings detail the reasons CLEC orders currently fall out from Level 5 flow through processing, both as a matter of design and due to common CLEC errors. Based on these studies, and on the coding resources available, BA-NY proposes the following systems

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changes to increase overall flow through levels. In all cases, the expected results assume that, absent the reason the error message was generated, the order would otherwise flow through.

12. These changes are in three groups. The first group can be implemented as soon as October 30, 1999:

Error Number	Reason Number Generated	Change
DOEE113	Listing address on platform order does not match listing address on CSR	Order rejected
DOEE113	Can Be Reached number on platform order is invalid	Order rejected
DOEE113	BA Retail Blocking exists on line in platform order	Order will flow through with retail blocking removed
DOEE155	Call Forward II package improperly placed on platform order	Order rejected (See Phase II related item)
UNEE163	Invalid blocking code or unauthorized NXX on platform order	Order rejected

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13. The "Phase II" changes can be made by December 18, 1999:

Error Number	Reason Number Generated	Change
DOEE135	CLEC orders partial migration on platform order without properly identifying new BTN	Order rejected
DOEE135	Ringmate ordered as part of platform	Ringmate will flow through as part of platform at Level 5
DOEE135	Additional listing exists on account in platform order	Additional listing will flow through at Level 5
DOEE135	Coin line ordered as part of platform	Coin line ordered as part of platform will flow through at Level 5
DOEE145	CLEC orders partial migration of account on platform order	Partial migrations of accounts will flow through at Level 5
DOEE155	Call Forward II package improperly placed on platform order	Component parts of Call Forward II package will flow through at Level 5 (See Phase I related item)

14. The "Phase III" changes require significantly more resources, and with the implementation of LSOG 4 in February 2000, cannot be completed until the 2nd Quarter of 2000. The Phase III changes are:

* * * REDACTED VERSION * * *

Error Number	Reason Number Generated	Change
DOEE113	Account on platform order contains a contract	Platform orders on accounts with contracts will flow through at Level 5
DOEE135	CLEC to CLEC Migrations on platform order (Current AECN does not equal request AECN)	CLEC to CLEC migrations on platform orders will flow through at Level 5
DOEE135	CLEC requests BTN number change on platform order	CLEC request for BTN change will flow through at Level 5
DOEE136	Form LSR Data:1 for Tag jk (supplemental order requesting cancellation of platform order)	<p>If CLEC order is pending, the cancellation will flow through at Level 5.</p> <p>If CLEC order is completed, cancellation will be rejected with message indicating CLEC should submit a disconnect order.</p>

15. Based on the existing data sampled in September, the Phase I changes will result in at least an additional 10-15% in overall platform flow through over existing levels. Phase II changes will result in an additional 15-20% in overall platform flow through over existing levels. Phase III changes will result in an additional 20-25% in overall platform flow through over existing levels.

16. BA-NY is mindful that a number of these system change proposals must proceed through the Change Control process as Type "4" changes. If there is a change to the business rules or interface resulting from the introduction of flow through or the rejection of an order consistent with the existing business rules, the current process calls for CLECs to be provided

with updated system documentation at least 66 days in advance of the change. However, BA-NY would be willing to implement these changes sooner than the standard change control interval if this acceleration is supported by other CLECs in the Change Control process. BA-NY suggests that a Change Control meeting be called no later than October 18 to determine whether the industry wishes to accelerate these changes. If the introduction of flow through or the rejection of an order consistent with the existing business rules results in no change to the interface or business rules, then BA-NY will provide notice to the CLECs in advance of the implementation date consistent with the change control process.

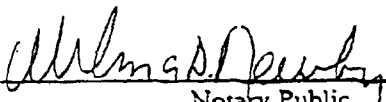
17. BA-NY again reiterates its commitment to work with MCI and other interested CLECs to achieve higher order flow through rates on their orders. BA-NY will do its part to succeed in this endeavor by taking the steps outlined herein as well as other steps that may in the future appear to be necessary. These commitments do not in any way negate the fact that BA-NY's ordering systems are today properly fulfilling BA-NY's obligations under the Act and the PFS to support the competitive efforts of MCI and other CLECs in the local New York market.

18. This concludes this Joint October Reply Affidavit.

I hereby swear, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge and belief.


Stuart Miller

Sworn to before me this 8th day of October
1999.


Notary Public

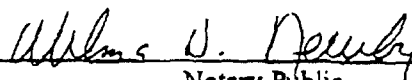
Sean J. Sullivan

Sworn to before me this ____ day of October
1999.

Notary Public


Arthur Zanzini

Sworn to before me this 8th day of October
1999.


Notary Public

I hereby swear, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge and belief.

Stuart Miller

Sworn to before me this ____ day of October
1999.

Notary Public

Arthur Zanfini

Sworn to before me this ____ day of October
1999.

Notary Public


Sean J. Sullivan

Sworn to before me this 27 day of October
1999.


Notary Public

*** * * REDACTED VERSION * * ***

EXHIBIT REFERRED TO IN THE
JOINT OCTOBER REPLY AFFIDAVIT OF STUART MILLER,
SEAN J. SULLIVAN AND ARTHUR ZANFINI
ON BEHALF OF BELL ATLANTIC - NEW YORK

ATTACHMENT 1

Bell Atlantic
1095 Avenue of the Americas
New York, NY 10036
37th Floor
Tel 212 395-6495
Fax 212 768-7568

William D. Smith
Counsel



October 8, 1999

BY HAND

Administrative Law Judge
Jaclyn A. Brillling
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

Re: Case 97-C-0139 – Status of Pre-filing Statement Flow Through Commitments

Dear Judge Brillling:

You have asked New York Telephone Company, d/b/a Bell Atlantic - New York ("BA-NY"), to review the status of the commitments regarding order flow through that were delineated in the April 6, 1998 Pre-filing Statement (the "PFS"). BA-NY made two specific commitments regarding the flow through of orders. First, it committed to flow through all orders types listed in Appendix 2 to the Pre-filing Statement either by the end of April 1998 or August 1998. (See PFS at 31 and Appendix 2.) As previously indicated to the Commission, BA-NY has provided order flow through for all the order types set forth in Appendix 2 of the Pre-filing Statement. (See Letter to the Honorable John C. Crary from Paul A. Crotty, dated August 21, 1998.) In addition, the recent KPMG test confirmed that BA-NY has provided flow through capabilities for all of these orders. (See "Bell Atlantic OSS Evaluation Project Final Report," submitted by

KPMG (dated August 6, 1999), Table IV-7.3 at POP 7-IV 154-155.¹ Thus, BA-NY has fully satisfied its commitment regarding flow through for the order types listed in Appendix 2.

Second, BA-NY committed to provide order flow through for all the orders listed in Appendix 3 to the Pre-filing Statement *after* August 1998. (PFS at 31 and Appendix 3.) Contrary to the claims of some parties, BA-NY did not commit to provide flow through of these order types prior to submitting its Section 271 Application to the Federal Communication Commission or prior to entry into the long distance market. Nothing in the Pre-filing Statement indicates or even implies such a commitment. To the contrary, the sensible approach embodied in the Pre-filing Statement was to provide flow through for these order types (as well as other, unlisted order types) as increasing CLEC use of the order types suggested which additional flow through capabilities would be most efficient. The Commission and Senior Staff were well aware that this was BA-NY's intent at the time the Pre-filing Statement was submitted.

Using this criterion, BA-NY has modified its systems so that the following order types listed in Appendix 3 now have flow through capability:

A. Resale

- Hunting
- Partial Acquisition (Not BTN)
- Outside moves
- Call answering
- Suspensions (Seasonal)
- Restorals (Seasonal)
- Ringmate

B. UNE

- New Link
 - 10 new links or greater completed in Level 4

¹ Table IV-7.3 lists all of the items set forth in Appendix 2, except for the exception indicators "Remarks data on resale form only" (Resale) and "Remarks data only" (Platform). BA-NY has confirmed that these two items do not prevent flow through of any Resale or Platform order types.

- Partial Migration
 - Additional listings
 - Any listings other than NLST for INP, and that is changing from existing listings
- Supplements on non-confirmed orders
- Full Migration
 - Additional listings
 - Any listings other than NLST for INP, and that is changing from existing listings²

Furthermore, in response to market demands, BA-NY has provided flow through capability for the following order types not listed in Appendices 2 or 3:

A. Resale

- Listings
 - Change (add, change, delete) Simple

B. UNE

- LNP – Standalone
 - Full Migration
 - Partial Migration without BTN change
 - Loop with LNP
- Post Migration Loop – Delete Loops
- Post Migration Loop with INP – Delete INP arrangements
- Listings – Changes (add, change, delete) Simple
- Loop
 - Increase Migrate limitations to 99

C. Platform

- Post Migration – Subsequent Activity Changes (adds, change, deletes)
 - Features (Simple)
 - Blocking
 - PIC/LPIC/Freeze PIC
 - Telephone # NOT BTN
- Post Migration

² Some confusion has arisen because the nomenclature used in some error codes for orders that do not flow through is similar to nomenclature used for some order types listed in both Appendices 2 and 3. This became apparent during a recent Carrier-to-Carrier meeting during which BA-NY reviewed the top eleven reasons that specific orders from three samples did not flow through. BA-NY will provide a written explanation regarding each of the concerns and issues that the parties raised in relationship to the error codes from the samples that were reviewed.

- Delete a Line
- Post Migration
 - Suspend and Restore
- Listings – Changes (add, change, delete) Simple
 - Associated to UNE-Platform
- Post Migration – Additional Listings

While there is no existing schedule for the implementation of flow through for the items from Appendix 3 that do not appear above, it is in BA-NY's own interest, as well as the CLECs' interests, to provide the most efficient methods and systems to process the flow of wholesale orders. As noted, BA-NY will continue to monitor the volumes associated with the order types received from CLECs to determine whether flow through capability should be introduced for any of these order types.³

BA-NY will be prepared to discuss the above information at the next Carrier-to-Carrier meeting.

Respectfully submitted,

William D. Smith

Attachment

cc: All Active Parties (Via Overnight and E-mail Delivery)

³ Attached is a chart that displays, as of October 1, 1999, the flow through capability of the order types listed in Appendices 2 and 3 of the Pre-filing Statement and in the subsequent milestone letters.

Bell Atlantic

PFS Flow Through Implemented as of 10/1/99

Resale	PFS	Committed Date	NEW	CAI	CWC	CAS	PM	Comments
1 Conversion with and without changes		4/6/98		Y	Y			
2 PIC modifications	✓	4/6/98			Y	Y		
3 PIC Freeze	✓	4/6/98			Y	Y		
4 Custom Calling features (changes, adds, deletes)								
5 Call Waiting	✓	4/6/98			Y	Y	Y	
6 3-Way calling	✓	4/6/98			Y	Y	Y	
7 Call Forwarding	✓	4/6/98			Y	Y	Y	
8 Speed Calling 8 & 30	✓	4/6/98			Y	Y	Y	
9 Touch Tone	✓	4/6/98			Y	Y	Y	
10 Full Disconnect	✓	4/6/98					Y	
11 Optional Calling Plans	✓	4/6/98			Y	Y	Y	
12 Class of Svc	✓	4/98				Y	Y	
13 Cust/co initiated blk	✓	4/98			Y	Y	Y	
14 RMKS data on resale form (only delete of an auxillary line)	✓	4/98			Y	Y	Y	
15 Phone Smart	✓	4/98			Y	Y	Y	
16 Oper Svc	✓	4/98			Y	Y	Y	
17 New Line	✓	4/98	Y					
18 Simple listings	✓	4/98	Y					
19 Valueflex	✓	5/98	Y					
20 Call forwarding II	✓	4/98	Y					
21 Hunting	✓	> 8/98	Y		Y	Y	Y	Series & circular
22 Partial acquisition	✓	> 8/98	Y			Y		Aux only
23 Complex Listings	✓	> 8/98	N	N	N	N		Straight line listings only
24 Call Answering	✓	> 8/98	Y		Y	Y	Y	
25 Modifications/cancels	✓	> 8/98	Y	Y	Y	Y	Y	Modifications sent on non confirmed original orders/no cancels
26 Outside moves	✓	> 8/98					Y	
27 Suspensions	✓	> 8/98					Y	Seasonal, both full and partial
28 Restorals	✓	> 8/98					Y	Seasonal, both full and partial
29 Intellidial	✓	> 8/98	N	N	N	N	N	
30 Direct Inward dialing	✓	> 8/98	N	N	N	N	N	
31 Ringmate	✓	> 8/98	Y	Y	Y	Y	Y	
32 Flexpath	✓	> 8/98	N	N	N	N	N	Design service

New-New Service, CAI-Convert as is, CWC-Covert with changes, CAS-Convert as specified, PM-Post Migration

Y-In Production
N-Not Complete

Loop and Local Number Portability		PFS	Committed Date	New	CON	PM	Comments
1	Basic Link	✓	4/98	Y			1-9 loops only
2	Partial migration w/o INP	✓	4/98		Y		INP is no longer offered
3	Partial migration of existing svc w/INP - RCF	✓	4/98		Y		INP is no longer offered
4	Full migration of existing svc w/o INP	✓	4/98		Y		INP is no longer offered
5	Full migration of existing svc w/INP - RCF	✓	4/98		Y		INP is no longer offered
6	Premium Link	✓	4/98	Y			
7	Addition of new link to existing account	✓	4/98			Y	
8	New basic link						
9	10 new links or greater completed in L4	✓	> 8/98	Y			Up to 99
10	If SBN not established	✓	> 8/98	N			
11	Expedites	✓	> 8/98	N			
12	Supplemental activity	✓	> 8/98	Y			Modifications sent on non confirmed original orders/no cancels
13	Partial migration						
14	Premium Link	✓	> 8/98		Y		For 1-9 loops
15	If SBN is not established	✓	> 8/98		N		
16	Complex and additional listings	✓	> 8/98	Y			Straight line additional line listing
17	Any listing other than NLST for INP, and that is changing from existing listing	✓	> 8/98				INP No longer applicable
18	Migrate BTN and create new BTN	✓	> 8/98		Y		taking BTN L2
19	Hunting	✓	> 8/98	N	N		
20	DPAs	✓	> 8/98	N	N		
21	Expedites	✓	> 8/98	N	N		
22	Supplemental activity	✓	> 8/98		Y		Modifications sent on non confirmed original orders/no cancels
23	Full migration						
24	Premium links	✓	> 8/98		Y		
25	If SBN not established	✓	> 8/98		N		
26	Complex and additional listings	✓	> 8/98	Y	Y		Straight line listings only
27	Any listing other than NLST for INP, and that is changing from existing listing	✓	> 8/98	Y	Y		Straight line listings
28	Hunting	✓	> 8/98	N	N		
29	DPAs	✓	> 8/98	N	N		
30	Expedites	✓	> 8/98	N	N		
31	Supplemental activity	✓	> 8/98		Y		Modifications sent on non confirmed original orders/no cancels
32	Post Migration - Delete loops	✓	8/21/98 ltr			Y	
33	Loops with LNP	✓	8/21/98 ltr		Y		
34	LNP standalone						
35	Full migration	✓	8/21/98 ltr		Y		
36	Partial migration without BTN change	✓	8/21/98 ltr		Y		
37	Listing changes						
38	w/LNP/INP	✓	8/21/98 ltr			Y	INP is no longer offered
39	Loop	✓	8/21/98 ltr			Y	
40	Loops off an EEL	✓	8/21/98 ltr			Y	Delete loop

New New Service, CAI Convert as is, CWC Convert with changes, CAS Convert as specified, Con Convert, PM Post Migration

Y-In Production
N-Not Complete

Bell Atlantic

PFS Flow Through Implemented as of 10/1/99

Loop and Local Number Portability		PFS	Committed Date	New	CON	PM	Comments
41	Increase Migrate limitations to 99	✓	10/26/98 ltr		Y	Y	L4

New-New Service, CAI-Convert as is, CWC-Covert with changes, CAS-Convert as specified, Con-Convert, PM-Post Migration

10/8/99

Y-In Production
N-Not Complete

Bell Atlantic

PFS Flow Through Implemented as of 10/1/99

Platform	PFS	Committed Date	NEW	CAI	CWC	CAS	PM	Comments
1 Migration of existing account "as is"	✓	4/98		Y				
2 Migration of existing account "as specified"								
3 Plus or minus								
4 Call Waiting	✓	4/98				Y		
5 3-Way calling	✓	4/98				Y		
6 Call Forwarding	✓	4/98				Y		
7 speed Calling 8 & 30	✓	4/98				Y		
8 Touch tone	✓	4/98				Y		
9 PIC modifications including PIC Freeze	✓	4/98				Y		PIC & LPIC
10 Cust/Co initiated Blkg	✓	4/98				Y		CLEC/end user
11 Rmks Data only delete an auxilary line	✓	4/98				Y		
12 Phonesmart	✓	4/98				Y		
13 Call Forwarding II	✓	4/98				Y		
14 Post migration Subsequent activity Changes (adds, changes, deletes)								
15 Delete a line	✓	8/21/98 ltr					Y	
16 Suspend and Restore	✓	8/21/98 ltr					Y	Seasonal
17 SNP & Restore	✓	8/21/98 ltr					Y	One way & two way
18 Features - Simple	✓	8/21/98 ltr					Y	
19 Telephone # not BTN	✓	8/21/98 ltr					Y	Telephone number change
20 Blocking	✓	8/21/98 ltr					Y	
22 PIC modifications including PIC Freeze	✓	8/21/98 ltr					Y	PIC & LPIC
23 Directory Lisitngs	✓	10/26/98 ltr					Y	Changes on straight line - main listings & additional listings

New-New Service, CAI-Convert as is, CWC-Covert with changes, CON-Convert, CAS-Convert as specified, PM-Post Migration

Y-In Production
N-Not Complete